

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

**TIFFANY DAVIS, SHUKRI ROBINSON
AND CRYSTAL LEWIS,** §
§
§

Plaintiffs, §
§
§

v. §
§
§

**ALOMEGA HOME HEALTH CARE,
LLC AND ALVERNA MCCULLOUGH,** §
§
§

Defendants. §

Case No. 1:23-cv-131-RP

**REQUEST FOR ENTRY OF DEFAULT
AGAINST DEFENDANT ALVERNA MCCULLOUGH**

Pursuant to Federal Rule of Civil Procedure 55(a) Plaintiffs Tiffany Davis, Shukri Robinson and Crystal Lewis respectfully request that the Clerk of the Court enter the default of Defendant Alverna McCullough. Previously, Defendant Alomega Home Health Care, LLC was served with a copy of the summons and the First Amended Complaint on July 6, 2023, and to date has never filed an Answer or otherwise made an appearance. The Clerk entered default against Alomega Home Health Care, LLC on August 1, 2023, ECF No. 16.

Defendant Alverna McCullough was served with a copy of the summons and the First Amended Complaint on May 17, 2024, making her Answer due by June 6, 2024. It is now June 11, 2024; as such, Defendant Alverna McCullough is in default.

Respectfully submitted,
WELMAKER LAW, PLLC

/s/ Douglas B. Welmaker
Douglas B. Welmaker
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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Request for Entry of Default has been served on Defendant Alomega Health Care on June 11, 2024 via the following method at the address below:

Via Certified Mail and Regular Mail

Alverna McCullough
41154 Cedar Creek Road
Hempstead Texas 77445

/s/ Douglas B. Welmaker
Douglas B. Welmaker